

**REMARKS**

Reconsideration and allowance in view of the foregoing amendments and the following remarks are respectfully requested.

Claims 1 and 3 have been amended. Claims 1-3 and 5-18 are pending in this application.

***Claim Rejections – 35 U.S.C. §102***

Claim 1 stands rejected under 35 U.S.C. §102(e) as being anticipated by Sung et al. Applicant traverses the rejection for the following reasons.

Amended claim 1 now recites, in part, the step of forming a barrier layer and a second metal interconnection on a capacitor and a first metal interconnection in sequence. Applicant submits that Sung et al. fails to disclose this limitation. As shown in Figs. 2F and 2G, a second barrier metal layer 175 and a second metal interconnection 180 are formed on the capacitor and the first metal interconnection in sequence. In contrast, according to Sung et al., a barrier metal layer 48 and a conductive metal layer 50 are formed in sequence only on the capacitor, and not on the first metal interconnection (for example, a copper metal line 54), as shown in Fig. 7.

Therefore, Applicant submits that claim 1 is not anticipated by Sung et al. under 35 U.S.C. §102(e).

***Allowable Subject Matter***


Applicant notes with appreciation that claims 8-15, 16-18 are allowed. Applicant further notes with appreciation that claims 2, 3 and 5-7 would be allowable if rewritten in independent form including all of limitations of the base claim and any intervening claims. As claim 1 is believed allowable as noted above, Applicant submits that claims 2, 3 and 5-7, which are dependent on claim 1, are also believed allowable.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that claims 1-3 and 5-18 are now in condition for allowance and a notice to that effect is earnestly solicited. If any issues remain to be resolved, the Examiner is cordially invited to telephone the undersigned attorney at the number listed below.

Respectfully submitted,

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